

JAP:CAC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-10-834**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

DANIELLER HUGEE,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER MCKELVY, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 20, 2010, within the Eastern District of New York and elsewhere, defendant DANIELLER HUGEE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

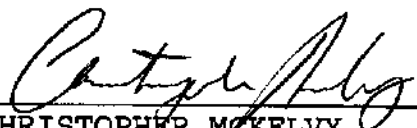
1. At approximately 1:16 a.m. on July 20, 2010, defendant DANIELLER HUGEE arrived at John F. Kennedy International Airport in Queens, New York, aboard Air Jamaica, flight number 17 from Kingston, Jamaica.

2. Defendant DANIELLER HUGEE was selected for a routine baggage exam. A Customs and Border Protection ("CBP") officer asked the defendant if the bags that she was carrying belonged to her, and she responded that they did. The defendant also admitted that she packed the bags herself. In addition, the defendant's baggage tags numbers JM311953 and JM311913 matched the claim numbers possessed by the defendant (the "suitcases"). Upon opening one of the suitcases, the CBP officer found an empty "Voyage" roller bag. The CBP officer noticed that the bottom of the Voyage roller bag was thick and extremely heavy.

3. Further examination of the Voyage roller bag revealed a false bottom. The false bottom was probed to reveal a white powdery substance. The substance field-tested positive for the presence of cocaine. At that point, the defendant DANIELLER HUGEE was placed under arrest.

4. The total approximate gross weight of the cocaine found in defendant DANIELLER HUGEE's suitcase is 2,484.16.

WHEREFORE, your deponent respectfully requests that  
defendant DANIELLER HUGEE be dealt with according to law.

  
CHRISTOPHER MCKELVY  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
20th day of July, 2010

THE HONORABLE RAMON E. RYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK